

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

<b>LASHEENA SIPP-LIPSCOMB AND</b>	<b>:</b>	<b>CIVIL ACTION NO. 20-cv-01926</b>
<b>ANDRES GARDIN, SR., Individually and in</b>	<b>:</b>	
<b>their own right and as Parents and Natural</b>	<b>:</b>	
<b>Guardians of ANDRES GARDIN, JR., a minor</b>	<b>:</b>	
	<b>:</b>	
<b>V.</b>	<b>:</b>	
	<b>:</b>	
<b>EINSTEIN PHYSICIANS PENNYPACK</b>	<b>:</b>	
<b>PEDIATRICS, et al</b>	<b>:</b>	
	<b>:</b>	

**EXHIBIT LIST OF DEFENDANTS,  
CHARLES W. CONCODORA, M.D. AND UROLOGY FOR CHILDREN**

1. Plaintiffs' Second Amended Complaint;
2. Answer with Affirmative Defenses of Defendants, Charles W. Concodora, M.D. and Urology for Children to Plaintiffs' Second Amended Complaint;
3. Plaintiffs' Answers to Defendant's Medical Malpractice Interrogatories;
4. Plaintiffs' Answers to Defendant's Request for Production of Documents;
5. Responses of Dr. Concodora and Urology for Children to Plaintiffs' Interrogatories and Request for Production of Documents re: Affirmative Defenses;
6. Emergency Room On-Call Agreement (redacted);
7. Section Chief Agreement (redacted);
8. Dr. Concodora and Urology for Children's Initial disclosures;
9. Any and all discovery responses by any party and documents produced therein;
10. Any documents produced by any party during discovery;
11. Any and all records, billing, labs, pathology reports, radiology studies/reports, ultrasound studies/reports, etc. of the Plaintiff Minor from:
  - a. Pennypack Pediatrics;

- b. St. Christopher's Hospital for Children;
  - i. Including but not limited to the films/reports from:
    - 1. US scrotal, 7/24/2019, 3:49 am
    - 2. US doppler, 7/24/2019, 3:49 pm
    - 3. US scrotal, 7/24/2019, 4:23 pm
    - 4. US doppler, 7/24/2019, 4:23 pm
- c. Albert Einstein Medical Center;
- d. Urology for Children;
- e. Tampa Pediatrics;
- f. St. Joseph's Hospital;
- g. St Christopher's Hospital Department of Audiology;
- h. Tri County Pediatrics/ David Meckler, M.D.;
- i. Pediatric Urology;

12. Any and all medical insurance records of the Plaintiff Minor;

13. Any and all other medical records of the Plaintiff Minor;

14. All radiology studies/films, ultrasounds, and radiology reports of the Plaintiff minor;

15. All operative reports concerning the Plaintiff minor;

16. All records and/or documents obtained by any party in response to a subpoena in this matter;

17. Deposition Transcripts of Lasheena Sipp-Lipscomb (3/22/21 and 6/4/21);

18. Deposition Transcript of Andres Gardin, Sr.;

19. Deposition Transcript of Arjun Kalyanpur, M.D.;

20. Deposition Transcript of Eric Y. Cho, M.D.;

21. Deposition Transcript of Pramath Nath, M.D.;

22. Deposition Transcript of Erin Hassel, M.D.;

23. Deposition Transcript of Charles Concordora, M.D.;
24. Deposition Transcript of Hayley Bartkus, BSDMS RDMS;
25. Deposition Transcript of Pam Brown;
26. Deposition Transcripts of Erica Poletto, M.D. (9/22/21 and 12/02/21);
27. Deposition Transcript of Allyson McDonnell;
28. Deposition Transcript of Frances Barlow, RN;
29. Deposition Transcript of Patricia Madison, RN;
30. Photographs of Plaintiff Minor;
31. Curriculum vitae of Defendant, Charles Concordora, M.D.;
32. Expert report of Andrew Kirsch, M.D.;
33. Expert report of Adam Hecht, M.D.;
34. Curriculum vitae of Andrew Kirsch, M.D.;
35. Curriculum vitae of Adam Hecht, M.D.;
36. Expert reports and curriculum vitae of co-Defendants' experts;
37. Teleradiology- Quality and Safety in Radiology;
  1. ACR Practice Parameter for Communication of Diagnostic Imaging Findings;
  2. All records and/or documents produced by any party in discovery;
  3. All records and/or documents reviewed by any expert in preparing his report;
  4. All insurance records;
  5. All billing records;
  6. All photos obtained and/or produced in discovery;
  7. Photos and/or videos of the Plaintiffs;
  8. Any and all audit trails;
  9. All photographs and/or videos;

10. Any and all medical literature, including but not limited to relating to testicular torsion, testicular torsion surgery, fertility, endocrine, and psychology of testicular torsion
11. Any medical literature relied upon by any expert;
12. Medical models, diagnostic studies, illustrations, computer images, graphics, diagrams, photographs, literature, videos, animation, images, etc.;
13. Chronology/timeline;
14. Materials for cross-examination purposes;
15. Any and all employment records pertaining to Plaintiffs;
16. Any and all pharmacy records pertaining to Plaintiff;
17. Enlargements of any of the listed exhibits;
18. Defendants reserve the right to introduce, refer to and/or utilize any or all of the exhibits listed in the Plaintiff's Exhibit List;
19. Defendants reserve the right to introduce, refer to and/or utilize any or all of the exhibits listed in the Co-Defendants' Exhibit List;
20. Defendants reserve the right to supplement this list with additional exhibits up to and during the time of trial.

GERMAN, GALLAGHER & MURTAGH

Date: November 1, 2022

BY: /s/ John P. Shusted

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Attorneys for Defendants,  
Charles W. Concordora, M.D. and  
Urology for Children

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of Defendants', Charles W. Concodora, M.D. and Urology for Children, Exhibit List was filed and served upon Plaintiffs' counsel on November 1, 2022, by way of the court's electronic filing and notification system.

GERMAN, GALLAGHER & MURTAGH

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